

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

**SCANSOFT, INC.'S MOTION TO COMPEL PRODUCTION OF  
MANFRED G. GRABHERR'S EMPLOYMENT CONTRACT WITH KURZWEIL**

Plaintiff ScanSoft, Inc. (“ScanSoft”) moves pursuant to Fed. R. Civ. P. 37 and Local Rule 37.1 for an order compelling the production of Manfred G. Grabherr’s employment agreement with Kurzweil, ScanSoft’s predecessor-in-interest. The grounds for this motion are set forth in the accompanying Memorandum and Exhibits A and B to the Memorandum, filed concurrently electronically.

Accordingly, it is respectfully requested that this motion be granted.

**CERTIFICATE PURUSANT TO RULE 7.1 AND LOCAL RULE 37.1**

I certify that counsel for ScanSoft conferred with counsel for VST on July 15, 2005, by telephone in an effort to resolve the issues presented by this motion and that counsel were unable to arrive at an agreement.

Dated: July 15, 2005

SCANSOFT, INC.,  
By its attorneys,

/s/ Rebecca L. Hanovice  
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